



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

May 1, 1997

Donna Singleton, Treasurer
National Republican Congressional
Committee - Expenditures
320 First Street
Washington, DC 20003

Identification Number: C00075820

Reference: October Monthly Report (9/1/96-9/30/96)

Dear Ms. Singleton:

On April 2, 1997 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your April 22, 1997 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-The Commission acknowledges your response concerning clarification for the purpose of disbursement described as "Meeting Expense;" however, your committee must provide a more detailed description for purpose of disbursement. 11 CFR §104.3(b)(3)(i)(B) discloses acceptable purposes of disbursement as: dinner expenses, media, salary, polling, travel, party fees, phone banks, travel expenses, travel expense reimbursement and catering costs. You state in your response, "...when the term 'Meeting Expense' is shown on Schedule H4 it is referring to fundraising meeting expenses, and when it appears on Schedule B supporting Line 21B, it is referring to political meeting expenses." It would appear that this broad term for purpose of disbursement is being used for disbursements which could be disclosed with a more descriptive purpose, (i.e. payroll, catering and travel). Please review your disbursements which are currently described as "Meeting Expenses" and amend the purposes of disbursement which require a more specific description.

-The Commission also acknowledges your response concerning the purpose and nature of receipts itemized on Schedule A supporting Line 15 of the Detailed Summary Page; however, further clarification concerning these receipts is necessary. 11 CFR §104.3(a)(4)(v) requires the disclosure of each person who provides a rebate, refund or other offset to operating expenditures to the reporting committee in an aggregate amount or value in excess of \$200 within the calendar year, together with the date and amount of any such receipt. Advisory Opinion 1985-28 states,

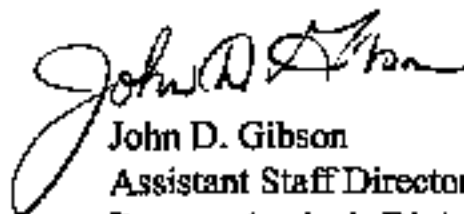
"The Downs rebate should be reported by FLE as an offset to operating expenditures on Line 14, FEC Form 3 (Line 15, FEC Form 3X for party committees and political action committees). If it exceeds \$200, it must be itemized on Schedule A with a brief description of the circumstances in which it was paid. 2 U.S.C. §434 (b)(3)(F), 11 CFR §104.3(a)(4)(v)."

To eliminate any confusion on the public record concerning these receipts appearing as prohibited contributions, please disclose each entry with a brief description of the circumstances in which they were received. Please amend your report to provide the necessary information.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Jennifer K. Wall on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division

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